

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

MICHAEL K. O'CONNELL	:	BK. NO. 1-16-00168
	:	
Debtors/Respondents	:	
	:	CHAPTER 13 PROCEEDING
	:	
PNC BANK, NATIONAL ASSOCIATION	:	
Movant	:	
	:	
v	:	
	:	
MICHAEL K. O'CONNELL	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Debtor, Michael K. O'Connell, by and through his attorney, James H. Turner, Esquire and Answers the Motion for Relief From Stay filed by PNC BANK, NATIONAL ASSOCIATION as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. By further answer, debtor admits to not making his post-petition mortgage payments, however he is now in a position to pay the full amount of the arrearage plus attorney's fees.
7. Admitted.

8. Admitted and Denied. Debtor admits to movant incurring legal fees and costs, however feels that \$850.00 in legal fees is excessive.

9. Admitted.

WHEREFORE, Debtor/Respondent requests this Honorable Court deny the Movant's Motion for Relief From Stay and schedule a hearing on this matter at the Court's earliest possible convenience.

Respectfully submitted,

/s/ James H. Turner

James H. Turner

Turner and O'Connell

4701 North Front Street

Harrisburg, PA 17110

pat@turnerandoconnell.com

(717) 232-4551

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

MICHAEL K. O'CONNELL	:	BK. NO. 1-16-00168
	:	
Debtors/Respondents	:	
	:	CHAPTER 13 PROCEEDING
	:	
PNC BANK, NATIONAL ASSOCIATION	:	
Movant	:	
	:	
v	:	
	:	
MICHAEL K. O'CONNELL	:	
Respondents	:	

CERTIFICATE OF SERVICE

I, James H. Turner, hereby certify that I served a true and correct copy of the foregoing by depositing a true and correct copy in the U.S. mail, first class postage prepaid, addressed, or e-mail as follows:

Charles J. DeHart III, Esquire
8125 Adams Drive
Suite A
Hummelstown, PA 17036

James C. Warmbrodt, Esquire
KML Law Group
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106

Date: 3/6/17

/s/ James H. Turner

James H. Turner